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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:

RETAIL GROUP, INC., *et al.*,<sup>1</sup>

Debtors

)  
) Chapter 11  
)  
) Case No. 20-33113 (KRH)  
)  
) (Jointly Administered)  
)

**NOTICE OF THE DEBTORS'  
FOURTEENTH OMNIBUS OBJECTION TO CLAIMS**

**PLEASE TAKE NOTICE THAT** on January 14, 2021, Retail Group, Inc. and its debtor affiliates (collectively, the “Debtors”)<sup>2</sup> filed the *Debtors’ Fourteenth Omnibus Objection to Claims* [Docket No. 1477] (the “Omnibus Objection”) with the Court. A copy of the Omnibus Objection is attached to this notice (the “Objection Notice”) as **Exhibit 1**. By the Omnibus Objection, the Debtors are seeking to disallow, expunge, and modify claims, including your claim(s), as set forth on **Exhibit A** thereto.

**PLEASE TAKE FURTHER NOTICE THAT** on December 23, 2020, the Court entered the *Order (I) Approving Procedures for Filing Omnibus Objections to Claims, (II) Approving the Form and Manner of the Notice of Omnibus Objections, and (III) Granting Related Relief* [Docket No. 1387] (the “Order”), by which the Court approved procedures for filing omnibus

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://cases.primeclerk.com/ascena>. The location of Debtor Retail Group, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 933 MacArthur Boulevard, Mahwah, New Jersey 07430.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Objection.

objections to proofs of claim (collectively, the “Claims” and each individually, a “Claim”) in connection with the above-captioned chapter 11 cases (the “Omnibus Objection Procedures”).

YOU ARE RECEIVING THIS OBJECTION NOTICE BECAUSE ALL PROOFS OF CLAIM LISTED HEREIN THAT YOU FILED AGAINST ONE OR MORE OF THE DEBTORS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES ARE SUBJECT TO THE OBJECTION. YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION. THEREFORE, YOU SHOULD READ THIS OBJECTION NOTICE (INCLUDING THE OBJECTION AND OTHER ATTACHMENTS) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

MOREOVER, UNDER THE OMNIBUS OBJECTION PROCEDURES, UNLESS A WRITTEN RESPONSE AND A REQUEST FOR A HEARING ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY WITHIN 21 CALENDAR DAYS OF THE MAILING OF THIS OBJECTION (THE “RESPONSE DEADLINE”), THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED, AND ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.

**Critical Information for Claimants**  
**Choosing to File a Response to the Omnibus Objection**

Who Needs to File a Response: If you oppose the disallowance and expungement of your Claim(s) listed above and if you are unable to resolve the Omnibus Objection with the Debtors before the deadline to object, then you must file and serve a written response (the “Response”) to the Omnibus Objection in accordance with this Objection Notice.

If you do not oppose the disallowance and expungement of your Claim(s) listed above, then you do not need to file a written Response to the Omnibus Objection and you do not need to appear at the hearing.

Response Deadline: The Response Deadline is **4:00 p.m. prevailing Eastern Time on February 4, 2021 (the “Response Deadline”).**

THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED BY THE RESPONSE DEADLINE.

Your Response will be deemed timely filed only if the Response is **actually received** on or before the Response Deadline by counsel for the Debtors:

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Unless otherwise adjourned by the Court or the Debtors pursuant to the Omnibus Objection Procedures, the hearing on the Omnibus Objection and your Response will be held virtually at **1:00 p.m. prevailing Eastern Time on March 18, 2021**, before the Honorable Kevin R. Huennekens, in the United States Bankruptcy Court for the Eastern District of Virginia, located at 701 East Broad Street, Suite 5100, Richmond, VA 23219-1888. You may register for the hearing through the following hyperlink:

[https://www.zoomgov.com/meeting/register/vJltdOuvqT4vHiBl\\_8x3gu\\_UfEQyMnj\\_rtE](https://www.zoomgov.com/meeting/register/vJltdOuvqT4vHiBl_8x3gu_UfEQyMnj_rtE)

Parties who wish to attend the hearing but do not intend on participating in the hearing (listen-only), are not required to register in advance and may attend the hearing by using the following dial-in numbers:

Phone Number: 1-866-590-5055	Phone Number: 1-888-363-4734
Access Code: 4377075	Access Code: 3238664
Security Code: 31821	Security Code: 31821

**Procedures for Filing a Timely Response  
and Information Regarding the Hearing on the Omnibus Objection**

***Contents.*** Each Response must contain the following (at a minimum):

- A. a caption setting forth the name of the Court, the name of the Debtors, the case number, and the title of the Omnibus Objection to which the Response is directed;
- B. the claimant's name and an explanation for the amount of the Claim;
- C. a concise statement setting forth the reasons why the Court should not sustain the Omnibus Objection with respect to your Claim(s), including, without limitation, the specific factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- D. a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Claim, upon which the claimant will rely in opposing the Omnibus Objection at the hearing; and
- E. the claimant's name, address, telephone number, and email address and/or the name, address, telephone number and email address of the claimant's attorney and/or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any (collectively, the "Notice Addresses"). If a Response contains Notice Addresses that are different from the name and/or address listed on the Claim, the Notice Addresses will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the Omnibus Objection (including all Claims to be disallowed and expunged and the surviving Claims) and only for those Claims in the Omnibus Objection.

***Additional Information.*** To facilitate a resolution of the Omnibus Objection, your Response should also include the name, address, telephone number, and email address of the party with authority to reconcile, settle or otherwise resolve the Omnibus Objection on the claimant's behalf (the "Additional Addresses"). Unless the Additional Addresses are the same as the Notice Addresses, the Additional Addresses will ***not*** become the service address for future service of papers.

***Failure to File Your Timely Response.*** If you fail to file your Response on or before the Response Deadline in compliance with the procedures set forth in this Objection Notice and timely serve it on the Debtors' attorneys, the Debtors will present to the Court an appropriate order granting the relief requested in the Omnibus Objection ***without further notice*** to you.

***Hearing Attendance.*** If you file a Response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. The Debtors, however, reserve the right to continue the hearing with respect to the Omnibus Objection and the Response.

***Rescheduling the Hearing.*** If the Court determines that the hearing on the Omnibus Objection will require substantial time for the presentation of argument and/or evidence, then the Court, in its discretion, may reschedule the hearing.

***Each Objection Is a Contested Matter.*** Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim.

### **Additional Information**

***Reply of the Debtors.*** The Debtors may file a reply to your Response or reply in oral argument at the hearing. In such event, the Debtors are permitted to file their reply no later than one calendar day before the hearing on the Omnibus Objection and the Response.

***Additional Discovery.*** Upon receipt of your Response, the Debtors may determine that discovery is necessary in advance of the hearing on the Omnibus Objection and your Response. In such event, the Debtors will serve separate notice to the Notice Addresses that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate resolution of the Response. Notwithstanding the foregoing, nothing herein modifies any parties' right to seek discovery or request that the scheduled hearing be treated as a status conference.

***Requests for Information.*** If you have any questions regarding the Omnibus Objection and/or if you wish to obtain a copy of the Omnibus Objection or related documents, you may call the Debtors' restructuring hotline at (877) 930-4319. You may also obtain a copy of the Omnibus Objection or related documents by visiting the Debtors' restructuring website at <https://cases.primeclerk.com/ascena/>.

***Reservation of Rights.*** Nothing in this Objection Notice or the Omnibus Objection constitutes a waiver of the Debtors' right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions, or any other claims against the

claimant of the Debtors. Unless the Court allows your Claims or specifically orders otherwise, the Debtors have the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date. In such event, you will receive a separate notice of any such objections.

*[Remainder of page intentionally left blank]*

Dated: January 14, 2021

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*/s/ Cullen D. Speckhart*

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